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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 ETHAN VOLUNGIS, an individual; FAROOQ  
12 ABDULLA, an individual; and NIGHAT  
13 ABDULLA, an individual

14 Plaintiffs,

15 vs.

16 LIBERTY MUTUAL FIRE INSURANCE  
17 COMPANY, a Foreign Corporation; DOES I  
18 through X, inclusive; and ROE BUSINESS  
ENTITIES, I through X, inclusive

19 Defendants.  
20

Case No. 2:17-CV-2247 JCM-VCF

**STIPULATION AND**  
**ORDER TO**  
**EXTEND BRIEFING SCHEDULE**  
**FOR DEFENDANT LIBERTY**  
**MUTUAL'S MOTION TO**  
**DISMISS PLAINTIFFS' FIRST**  
**AMENDED COMPLAINT (ECF**  
**38)**

**(First Request)**

21 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs ETHAN  
22 VOLUNGIS, FAROOQ ABDULLA, and NIGHAT ABDULLA, through their counsel of  
23 record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant  
24 LIBERTY MUTUAL FIRE INSURANCE COMPANY, through its counsel of record,  
25 Frank Falzetta and Jennifer Hoffman of SHEPPARD MULLIN RICHTER &  
26 HAMPTON, LLP and Walter R. Cannon of OLSON CANNON GORMLEY &  
27 STOBERSKI, that the deadline for Plaintiffs to file their Response to Defendant Liberty  
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1 Mutual's Motion to Dismiss Plaintiffs' First Amended Complaint shall be extended  
2 seven (7) days, from August 20, 2020 to August 27, 2020. Defendant Liberty Mutual  
3 filed its Motion on August 6, 2020.

4 IT IS FURTHER STIPULATED AND AGREED that the deadline for Defendant  
5 Liberty Mutual to file its Reply Brief to Plaintiffs' Opposition shall be extended seven  
6 (7) days from September 3, 2020 to September 10, 2020. This is the first request for  
7 extension of time to file briefing arising from Defendant Liberty Mutual's Motion to  
8 Dismiss. This Stipulation and [Proposed] Order is submitted in accordance with LR IA  
9 6-1.

10 The parties respectfully request this brief extension of time for a multitude of  
11 reasons. Plaintiffs' lead counsel, Dennis M. Prince, participated in a trial before the  
12 Eighth Judicial District Court styled as *In Re: D.O.T. Litigation*, Case No. A-19-787004-  
13 B. This trial lasted approximately six weeks and concluded on Tuesday, August 18,  
14 2020. In addition, Plaintiffs' other counsel, Kevin T. Strong, was recently out of the  
15 office to undergo a medical procedure. Given the complexities of the arguments set forth  
16 in Defendant Liberty Mutual's Motion, additional time is needed to ensure the issues  
17 presented are fully addressed by both parties to aid this Court in its ultimate decision.  
18 This brief extension of time will allow both parties a full and fair opportunity to achieve  
19 this result.

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Accordingly, the parties respectfully request this Court to approve the foregoing stipulation. Their requested extension of time is not made in bad faith or for any other untoward purpose.

DATED this 20th day of August, 2020.

DATED this 20th day of August, 2020

**PRINCE LAW GROUP**

**SHEPPARD MULLIN RICHTER &  
HAMPTON, LLP**

/s/ Kevin T. Strong  
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/s/ Frank Falzetta  
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*Liberty Mutual Fire Insurance Company*

**ORDER**

**IT IS SO ORDERED.**

DATED August 24, 2020.

*James C. Mahan*  
UNITED STATES DISTRICT JUDGE